

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

JUANA CRUZ, OFELIA BENAVIDES,
JOSE ELIAS NG, GABRIELA
VELAZQUEZ, RICARDO GONZALO,
MELESIO CRUZ, ANGELICA
CHAVEZ, CONCEPCION PEREZ,
OLGA PEREZ, MAURICO SANCHEZ,
JORGE MAULEON, HECTOR
SANCHEZ, HECTOR GONZALEZ,
YESSY PEREZ MARTINEZ MARIA
DE LOURDES CRUZ, RESENDO
LIEVANOS, ELIZABETH LARA,
LUIS ALBERTO ZUNGIA CASTILLO,
MIGUEL CABALLERO SANCHEZ,
GUILLERMO DE LA CRUZ
MENDOZA, CARLOS DANIEL
LOPEZ, GILDA RIVAS, ARMANDO
MORALES DE LLANO, LAZARO
GARCIA, MARIA DE JESUS
MEDINA, RICHARD ESQUIVEL,
PATRICIA CONDE-GONZALEZ,
NORMA CONDE ALANIZ, RAFAEL
SANCHEZ, GUILLERMO RUIZ,
ROSA QUINTANILLA
Individually,

CIVIL ACTION NO.: 7:23-cv-00343

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**DELGAR FOODS, INC D/B/A/
DELIA'S TAMALES**
Defendant.

PLAINTIFFS' DESIGNATION OF EXPERT WITNESSES

NOW COME Plaintiffs through their undersigned counsel in the above-styled and numbered civil action, and serve their Designation of Expert Witnesses.

I.

Plaintiffs hereby designate the following expert witnesses who may be called to testify in the trial of this civil action:

Ricardo Gonzalez
Oxford & Gonzalez, P.C.
124 S. 12th St.
Edinburg, Texas 78539
Telephone: (956) 383-5654
Expert will testify as to attorneys' fees. See attached curriculum vitae.

Norberto Torres, CPA, EA, MBA, CGMA
Moore Lyles McCarty & McGilvray, LLP
501 W. Nolana Avenue
McAllen, Texas 78504
Telephone: (956) 630-3053
Expert will testify as to Plaintiffs' wages, social security deductions and other deductions, and financial damages.

Richard Alamia
Attorney at Law
619 S. 12th Ave.
Edinburg, Texas 78539
Telephone: (956) 381-5766
Expert will testify as to attorneys' fees. See attached curriculum vitae.

II.

Plaintiffs reserve the right to elicit, by way of cross-examination, opinion testimony, and adverse testimony, from experts and non-expert witnesses designated and called by other parties to this suit. Further, Plaintiffs will make available for depositions in accordance with the Federal Rules of Civil Procedure.

III.

Plaintiffs reserve the right to supplement this designation with additional designation of experts within the time limits imposed by the Court or any alterations of same by subsequent Court Order or agreement of the parties, or pursuant to the Federal Rules of Civil Procedure and/or Federal Rules of Civil Evidence.

IV.

Plaintiffs reserve the right to call un-designated rebuttal expert witnesses whose testimony cannot reasonably be foreseen until the presentation of the evidence in this trial. Plaintiffs reserve the right to withdraw the designation of any expert and to aver positively that any such previously designated expert will not be called as a witness at trial, and to re-designate the same as a consulting expert, who cannot be called by opposing counsel. Plaintiffs hereby designate, as adverse parties, potentially adverse parties, and/or as witnesses associated with adverse parties, all parties to this suit and all experts designated by any party to this suit, even if the designating party is not a party to this suit at the time of trial. In the event a present or future party designates an expert but then is dismissed for any reason from the suit or fails to call any designated expert, Plaintiffs reserve the right to designate and/or call any such party or any such experts previously designated by any party. Plaintiffs reserve whatever additional rights they might have with regard to experts, pursuant to the Federal Rules of Civil Procedure, the Federal Rules of Civil Evidence, the case law regarding same and the rulings of this Court. Plaintiffs reserve the right to elicit expert, lay or adverse opinions by way of examinations, cross-examination or other means, whether appropriate, from those witnesses designated by Plaintiffs or Defendant who may have knowledge of relevant facts and/or have been designated as expert witnesses by other parties.

Respectfully submitted,

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BY: /s/ Ricardo Gonzalez
Ricardo Gonzalez
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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I, Ricardo Gonzalez, hereby certify that on this the 28th day of June, 2024, in accordance with the Federal Rules of Civil Procedure, a true and correct copy of the foregoing instrument was served on each party to this civil action by Plaintiffs' submission to the U.S. District Court electronically via the CM/ECF system.

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Stephen Quezada
Stephen.quezada@ogletree.com

/s/ Ricardo Gonzalez
Ricardo Gonzalez